

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :
Plaintiff, : 17 Cr. 372 (JBS)

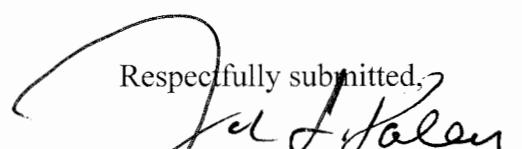
-against- :
JEFFREY CHARTIER, et al., (ISEN) :
Defendant. :
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NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the attached Memorandum of Law; the Affirmation of John F. Kaley, sworn to on May 30, 2018; the Declaration of Lawrence Isen, sworn to on May 31, 2018; and the exhibits attached thereto, defendant Lawrence Isen will move this court before the Honorable Joanna B. Seybert for an Order: (1) granting a *Monsanto*-type hearing, *see United States v. Monsanto*, 924 F.2d 1186 (2d Cir. 1991) and upon said hearing directing the Government to release seized funds; (2) directing the Government to remove any *lis pendens* or other restraints on Defendant's property; and (3) granting any further relief the Court in its discretion deems appropriate.

Dated: New York, New York
May 31, 2018

Respectfully submitted,


John F. Kaley, Esq. (JK:3598)

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